

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**STIPULATION AND [PROPOSED]
ORDER REGARDING COMPENSATION
INFORMATION FOR META
DEPONENTS**

STIPULATION

The Personal Injury (“PI”), School District and Local Government Entity (“SD”), and Attorney General (“AG”) Plaintiffs (collectively “Plaintiffs”) and Meta (Plaintiffs and Meta together, the “Parties”) hereby stipulate as follows:

1. At the November 21, 2024, Discovery Management Conference, the Court directed the Parties to meet and confer on the deponent compensation dispute. Since then, the Parties have continued to work together on this issue, meeting and conferring to come to a resolution.

2. To that end, the Parties have agreed, pending the Court’s consent, that Meta will conduct a reasonable investigation into whether at any point during the Relevant Time Period (January 1, 2012 through April 1 2024), there was a discrepancy between (a) the Bonus Compensation given to any of the following 11 deponents and (b) the Bonus Compensation Policy Meta has produced to Plaintiffs in discovery in this litigation (META3047MDL-029-00000008-00000011):

- a. M.B
- b. A.D.
- c. W.G.
- d. V.J.
- e. R.S
- f. S.B.
- g. K.J.
- h. K.N.
- i. P.R.
- j. G.R.
- k. M.R.

3. If Meta identifies any such discrepancy in Bonus Compensation for any of the above eleven deponents during the Relevant Time Period, it will notify Plaintiffs’ counsel and will produce documents sufficient to show the total amount(s) of Bonus Compensation Meta provided to that deponent for the bonus period(s) when the discrepancy occurred.

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2 4. Meta agrees to identify any such discrepancies and produce documents sufficient to show
3 the total Bonus Compensation for each time period where the discrepancy occurred 7 days before any
4 noticed deposition.

5 5. For depositions noticed for less than 14 days from the entry of this order, Meta agrees to
6 identify any such discrepancy and produce documents sufficient to show the total Bonus Compensation
7 for each time period where the discrepancy occurred at least 48 hours ahead of the noticed deposition.

8 6. Where the deposition has already occurred, Meta agrees to identify any discrepancy and
9 produce documents sufficient to show total Bonus Compensation for each time period where the
10 discrepancy occurred within 30 days of the entry of this order.

11 **[PROPOSED] ORDER**

12 7. In accordance with the Parties' stipulated agreement, the Court hereby ORDERS Meta to
13 conduct a reasonable investigation into whether at any point during the Relevant Time Period (January 1,
14 2012 through April 1, 2024), there was a discrepancy between (a) the Bonus Compensation given to any
15 of the following 11 deponents and (b) Meta's Bonus Compensation Policy:

- 16 a. M.B
17 b. A.D.
18 c. W.G.
19 d. V.J.
20 e. R.S
21 f. S.B.
22 g. K.J.
23 h. K.N.
24 i. P.R.
25 j. G.R.
26 k. M.R.

27 8. The Court further ORDERS Meta to identify the fact of any Bonus Compensation
28 discrepancy for the 11 deponents to Plaintiffs' Counsel and to produce documents sufficient to show the

total amount(s) of the Bonus Compensation for the bonus period(s) when the discrepancy occurred according to the schedule set forth above.

IT IS SO ORDERED.

Dated: December __, 2024

MAGISTRATE JUDGE PETER H. KANG

1 DATED: December 11, 2024

By: /s/ Lexi J. Hazam

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ATTESTATION

I, Jennifer Scullion, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1 that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 11, 2024

/s/Jennifer Scullion